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November 7, 2013

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

***Via Electronic Filing***

**Re: MB Docket No. 13-50, *Request for Clarification of the Commission's Policies and Procedures Under 47 U.S.C. § 310(b)(4)***

Dear Ms. Dortch,

On Tuesday, November 5, 2013, Matthew Wood, Joseph Torres, and I met with Sarah Whitesell, Media Legal Advisor for Commissioner Clyburn, and separately with Holly Saurer, Media Legal Advisor for Commissioner Rosenworcel, to discuss issues in the above-captioned docket.

During both meetings, we primarily discussed Free Press's views on the upcoming Open Meeting agenda item regarding foreign investment in broadcasting, as set forth in Section 310(b) of the Act.

With regard to the foreign ownership rules, Free Press remains chiefly concerned with preserving diversity and localism in the broadcast industry. Specifically, we are wary that foreign owners may exercise editorial control over stations in which they have invested. This concern is particularly relevant in Latino communities where, historically, foreign investors have ignored American-Latino issues and content in favor of programming from Latin countries. What's more, we question whether increased foreign investment would lead to the outsourcing of editorial jobs. Bearing these concerns in mind, we urged the Commission to consider how any clarification of its policies might impact the number of voices in a given market and license holders' abilities to responsibly serve local communities.

We also remain skeptical of the purported benefits from allowing indirect foreign investment in broadcast stations beyond the current 25% benchmark. Some parties in the proceeding have alleged that encouraging indirect foreign investment in broadcasting will provide new opportunities to diverse broadcasters, who have historically been denied access to the necessary capital to keep pace with competitors or enter the market at all. However, it is unclear why foreign banks and investors would take a risk on such owners, who are overwhelmingly single-station owners, while American banks and investors have not. Foreign investments very well could instead go to the country's largest broadcasters, who can provide the largest return on investment through station acquisitions and the "synergies" created by consolidation. Consequently, the likely result will be less diversity and more corporate ownership divorced from local communities.

We file this *ex parte* notice today, pursuant to Section 1.1206(b) of the Commission's rules. If you have any question regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

/s/ Lauren M. Wilson

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cc: Sarah Whitesell
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